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Attorneys for Plaintiff
UNITED STATES OF AMERICA

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

ARA ARTUNI, ET AL.,

Defendants.

CR 2:25-mj-02952-DUTY

GOVERNMENT'S EX PARTE APPLICATION
FOR ORDER SEALING COMPLAINT AND
ACCOMPANYING DOCUMENTS;
DECLARATION OF KENNETH R. CARBAJAL

(UNDER SEAL)

Plaintiff United States of America, by and through its counsel
of record, the United States Attorney for the Central District of
California and Assistant United States Attorneys Lyndsi Allsop and
Kenneth R. Carbajal, hereby applies ex parte for an order that the
complaint, underlying affidavit, and arrest warrant, as well as this
ex parte application, be filed under seal.

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1 This ex parte application is based upon the attached declaration
2 of Kenneth R. Carbajal.

3 Dated: May 14, 2025

Respectfully submitted,

4 BILAL A. ESSAYLI
United States Attorney

5 CHRISTINA T. SHAY
6 Assistant United States Attorney
7 Chief, Criminal Division

8 /s/

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KENNETH R. CARBAJAL
LYNDSI ALLSOP
10 Assistant United States Attorneys

11 Attorneys for Plaintiff
UNITED STATES OF AMERICA
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DECLARATION OF KENNETH R. CARBAJAL

I, Kenneth R. Carbajal, declare as follows:

1. I am an Assistant United States Attorney in the United States Attorney's Office for the Central District of California. I am the attorney representing the government in this case.

2. The defendants charged in the above-captioned case have not been taken into federal custody and have not been informed that they are being named as defendants in this case. The likelihood of apprehending the defendants might be jeopardized if the complaint in this case was made publicly available before the defendants are taken into custody. Indeed, public disclosure of the complaint, the affidavit in support of the complaint, and the arrest warrant could seriously jeopardize other aspects of the investigation, result in destruction of or tampering with evidence, or cause intimidation of potential witnesses.

3. Accordingly, the government requests that the complaint, affidavit, and arrest warrant, as well as this ex parte application, this declaration, and this Court's sealing order, be kept under seal until at least one of the defendants are taken into custody on the charge contained in the complaint and the government files a "Report Commencing Criminal Action" in this matter, or until the government determines that these materials are subject to its discovery obligations in connection with criminal proceedings, at which time they may be produced to defense counsel. The government also requests that the government be permitted to disclose the complaint and affidavit as permitted or required by law.

4. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and

1 that this declaration is executed at Los Angeles, California, on May
2 14, 2025.

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4 /s/ Kenneth R. Carbajal

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KENNETH R. CARBAJAL
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